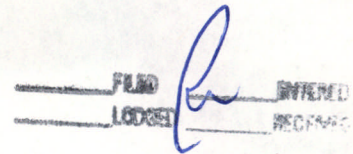


**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

GREENBELT DIVISION



AT GREENBELT
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY [signature] DEI

JOHN HILL, pro se

PLAINTIFF,

V.

CASE NO. RWT 13-524

WILMINGTON FINANCE, INC., et al.,

DEFENDANTS.

MOTION FOR SANCTIONS

NOW COMES, the PLAINTIFF, JOHN HILL, pro se, who moves that this Court would place sanctions upon the DEFENDANTS, and each of them (including the SUBSITUTE

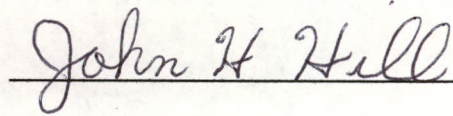
TRUSTEES which claim to represent one or more of the DEFENDANTS) for the reasons given herein. This Motion comes pursuant to Fed. R. Civ. P. Rule 11(c).

1. The DEFENDANTS and each of them, through officers, employees, agents, attorneys and/or trustees, have come before the Court to plea for foreclosure of the Subject Property under Maryland Law.
2. Fed. R. Civ. P. Rule 11(b)(3) does state that “the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery;”
3. The alleged documents and/or securities instruments being used by the DEFENDANTS to claim authority are not factual, do not have evidentiary evidentiary support, and/or will not likely have evidentiary support through further investigation and/or discovery.
4. The PLAINTIFF has specifically requested, in good faith, proof and/or verification of the validity of those documents and/or securities instruments.

5. The DEFENDANTS have failed and/or refused to produce such proof and/or verification.
6. This failure is a violation of the UCC and does therefore nullify the claims of the DEFENDANTS.
7. As such, those claims are in violation of Fed. R. Civ. P. Rule 11(b)(3).
8. Fed. R. Civ. P. Rule 11(c)(1) does state that “If, after notice and a reasonable opportunity to respond, the court determines that Rule 11(b) has been violated, the court may impose an appropriate sanction on any attorney, law firm, or party that violated the rule or is responsible for the violation. Absent exceptional circumstances, a law firm must be held jointly responsible for a violation committed by its partner, associate, or employee.”
9. As the SUBSTITUTE TRUSTEES are members of a law firm which is essentially representing its own interests (as well as those interests of each of the other DEFENDANTS) it is clear that Ms. Ward and her associates must now be held liable for making false representations to this Court.

WHEREFORE, the PLAINTIFF does hereby move that this Court would impose such sanctions upon the SUBSTITUTE TRUSTEES, the law firm which employs each of those SUBSTITUTE TRUSTEES, each of the DEFENDANTS, and/or any other individual and/or entity which has played a part in this misrepresentation and fraud upon this Court pursuant to Fed. R. Civ. P. Rule 11(c).

Respectfully submitted and signed.

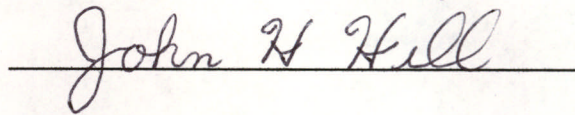
A handwritten signature in dark ink, reading "John H Hill", is written over a horizontal line.

John Hill (Plaintiff)

VERIFICATION

I, John Hill, am Plaintiff in the above-entitled action. I have read the foregoing and know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein alleged on information and belief, and as to those matters, I believe it to be true.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed in the State of Maryland.

A handwritten signature in cursive script, reading "John H Hill", is written over a solid horizontal line.

John Hill (Plaintiff)

CERTIFICATE OF SERVICE

I, John Hill (Plaintiff), do hereby swear and attest that I have delivered a copy of this filing of this document to each of the following individuals and/or entities pursuant to the laws of the State of Maryland...

1)Wilmington Finance, Inc.

401 Plymouth Rd. Ste 400

Plymouth Meeting, PA 19462

2)Nationstar Mortgage

350 Highland Drive

Lewisville, TX 75067

3)Countrywide Home Loans, Inc.

4500 Park Granada Blvd.

Calabassas, CA 91302-1613

4)CWABS, Inc.

4500 Park Granada Blvd.

Calabassas, CA 91302-1613

5)Countrywide Home Loans Servicing LP

4500 Park Granada Blvd.

Calabassas, CA 91302-1613

6)The Bank of New York Mellon

1 Wall Street, Manhattan

New York, NY 10005

7)International Mtg Co

450 N Brand Blvd Ste 150

Glendale, CA 91203

8)Wells Fargo Bank NA

420 Montgomery St

San Fransisco, CA 94104

9)Premium Capital Funding LLC

125 Jericho Turnpike Ste 400

Jericho, NY 11753

10)CIT Group/Consumer Finance, Inc.

8000 Sagemore Dr. Ste 8202

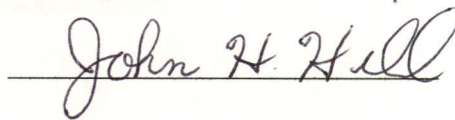
Marlton, NJ 08053

11) Carrie M. Ward, et al (Substitute Trustees)

4520 East West Highway, Suite 200

Bethesda, MD 20814

Each of these copies was delivered via USPS, certified mail, restricted delivery as demanded by the Code of Maryland, Rules of Civil Procedure on this, the 12 day of May in the year 2012.

A handwritten signature in cursive script, reading "John H. Hill", written over a horizontal line.

John Hill (Plaintiff)